

# Federal Defenders OF NEW YORK, INC.

Southern District  
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*David E. Patton  
Executive Director  
and Attorney-in-Chief*

*Southern District of New York  
Jennifer L. Brown  
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September 16, 2021

**VIA ECF**

Honorable Judge Laura Taylor Swain  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Selassie Sinclair  
21 Cr. 52 (LTS)**

Dear Judge Swain:

I write on behalf of my client Selassie Sinclair with consent from Assistant United States Attorney Sarah Kushner and United States Pretrial Officer Mohammed Ahmed, to respectfully request that the Court modify the conditions of the bond authorizing Mr. Sinclair to accompany his nine-year sister to and from the bus stop on the same block as his residence and to permit Mr. Sinclair to leave his residence to attend programming as directed by Pretrial Services.

On January 12, 2021, Your Honor imposed the following bail conditions: A \$50,000 personal recognizance bond to be cosigned by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; home incarceration with GPS monitoring; Remote Mental Health Evaluation/Treatment as directed by pretrial services; avoid all contact with all codefendants including his brother, Judah Sinclair, and surrender of travel documents with no new applications.

Mr. Sinclair plans to be outside of the house Monday through Friday from 7:25am to 7:50am to drop off his sister at the school bus, and from 3pm to 3:35pm in order to wait for and accompany her back home. The bus stop is located on Junius Street between East New York Avenue and Liberty Avenue in Brooklyn. Additionally, Mr. Sinclair hopes to participate in educational, vocational, mental health, and/or any other programming that Pretrial Services deems appropriate.

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Thank you for your consideration of this request.

Respectfully submitted,

The foregoing requests are granted. DE  
51 resolved. SO ORDERED.  
9/16/2021  
/s/ Laura Taylor Swain, Chief USDJ

/s/  
Marisa K. Cabrera  
Assistant Federal Defender  
Tel.: (212) 417-8730

**SO ORDERED:**

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**HONORABLE Laura Taylor Swain  
United States District Judge**

**cc: Sarah L. Kushner, Esq., Assistant United States Attorney  
Mohammed Ahmed, Pretrial Services Officer**